

Draft Yarra Open Space Strategy 2019



Image credit: City of Yarra



Prepared by: Streets Alive Yarra

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Foreword

Streets Alive Yarra is a non-profit, volunteer, resident and ratepayer action group with a [vision](#) for more trees, wider footpaths and vibrant businesses in thriving [neighbourhoods](#). We see our streets being used by people from [8 to 80 years old](#), irrespective of whether they choose to walk, cycle, use public transport or drive. Residents and shoppers are able to move safely, comfortably, and conveniently around Yarra; and can easily find a park near shops.



Image credit: OCULUS Landscape Architecture and Urban Design

Streets Alive Yarra was founded in 2017 and now has over 2,300 likes on Facebook, increasing by 10-20 per week. A network of local champions develops concepts and proposals for how to improve their local street or precinct. Streets Alive Yarra is also Yarra's Walkability Action Group (WAG) representative for Victoria Walks.

Further information is available at www.streets-alive-yarra.org.

Overview

Streets Alive Yarra welcomes the opportunity to make a submission regarding the draft Yarra Open Space Strategy 2019 (YOSS), which is an update of the currently adopted 2006 strategy. Overall the strategy looks very promising, and we commend Council and Thompson Berrill Landscape design in undertaking a thorough analysis of the existing open space gaps, and describing the process of developing the strategy.

We believe that the strategy would be improved by:

- Redefining streets as opportunities for new Open Space;
- Conducting Gap Analyses on LAPM areas instead of precincts;
- Focussing on LAPMs that have the least open space;
- Adjusting the contribution rate; and
- Working with the VPA to improve open space in Cremorne.

Define streets as open space

We disagree with the strategy's proposed definition of 'open space' because, in areas where land is expensive, it prevents the most pragmatic solution, which is to use our streets as open space. A clear example is Cremona - the gap analysis shows that new open space is required, but the recommendations do not offer a solution. Instead the problem is ignored for the duration of the strategy (until 2031).

The Technical Report page 4 defines streets as 'ancillary open space' and claims that they are primarily set aside for 'their transport function and purpose'. This misses the whole point - they should be set aside for place making and open space, not just transport, as part of a holistic approach to urban planning.

The Technical Report page 6 claims that the strategy will 'strengthen the linear connections and sustainable transport options' but the strategy makes no recommendations at all to this end. This is a failure of logic - the strategy can't strengthen linear connections unless our streets are part of the scope.

A much better strategy would be to redefine the problem. Indeed, the Technical Report page 29 references London's definition and use of 'Linear open space' but fails to replicate it. This solution is not new or contentious, as shown by its inclusion in the 1985 Metropolitan Arterial Road Access Study.

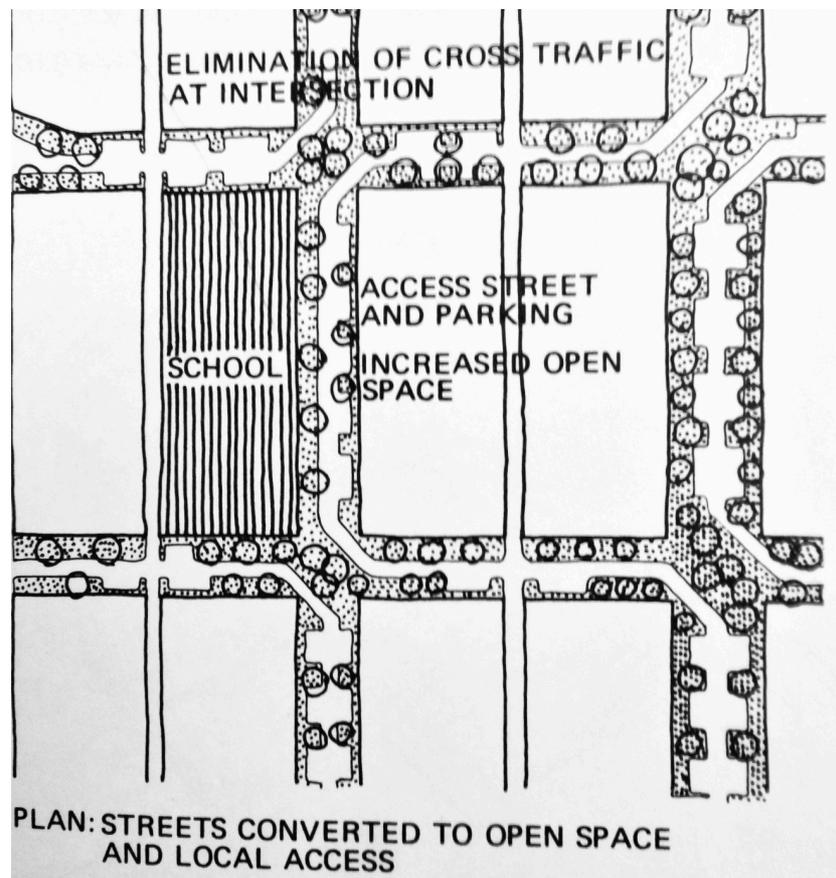


Image source: Victorian Ministry of Transport (1985). METRAS, Metropolitan Arterial Road Access Study, Region 4, Eastern.

Conduct gap analyses on LAPM areas

We were particularly pleased to see the gap analysis focused on specific areas, and included consideration of accessibility/walkability to each of the existing open spaces, rather than just distance. The concept of a larger open space having a wider catchment area is also useful.

However, although the spatially based analysis is sufficiently fine-grained, the precinct approach has some problems. It would be more meaningful to use existing [Local Area Place Making](#) (LAPM) areas, rather than larger precincts (each representing two or three LAPMs). This would allow direct alignment with the LAPM process (as described later in this document) and more readily reflect walkable accessibility. As the strategy itself acknowledges, LAPM boundaries are generally defined by larger roads which are difficult to cross on foot. The precincts as currently defined in the draft YOSS, particularly Fairfield/Alphington and Cremorne/Richmond South/Burnley, are in some cases several kilometres east to west, which we believe is not reflective of a walkable catchment.

Direct alignment with LAPMs would build on the existing process which Council uses to manage effort and expenditure on local public space improvements, and help ensure that such improvements were spread as equitably as possible across Yarra.

Using a LAPM-based approach and with reference to the Gap Analysis figure provided, it is immediately apparent that LAPM Areas 12 (Collingwood), 14 (North Richmond), 17 (Richmond) and 20 (Balmain-Cremorne) currently have the greatest need for new open space. These identified areas are less clear in the precinct summary as presented, because of averaging over a larger area of land.

Focus on LAPMs that have the least space

It was great to see that the individual projects recommended for each precinct were ranked as low or high priority, however it's disappointing that this approach was not also applied between precincts. Streets Alive Yarra believes that the focus of the YOSS should be on new open space in areas which are most lacking, ie Collingwood (LAPM 12), Richmond west of Church Street (LAPMs 14 and 17), and Cremorne (LAPM Balmain 20).

Prioritisation should be integrated with the LAPM process. It is inequitable to spend more money on open space in North Carlton and North Fitzroy when other areas are missing out, particularly since it is these higher density areas which are also experiencing the greatest redevelopment pressures currently.

Lack of existing open space should be one of the criterion used in ranking the order of priority for upcoming LAPMs (that is, define a measure for existing open space to add to the existing LAPM ranking criteria, as per the table below).

Table: Current Council Criteria for Ranking LAPM Priority Order, from City of Yarra website

Criteria	Measure
Casualty crashes (accidents):	Number of recorded crashes on local streets in each precinct
Traffic volumes:	Local streets with average traffic volumes generally greater than 1000 vehicles per day
Traffic speeds:	Local streets with 85%tile vehicle speeds generally greater than 44kph
Through-traffic:	Local streets with a peak hour to 24 hour volume ratio generally greater than 14%
Activity generators:	Presence of land uses such as schools and hospitals which generate high numbers of pedestrians and cyclists
Community input or complaints:	Number of received written correspondence, petitions and telephone records in each precinct

In addition to this approach to prioritisation, we also consider there is tremendous opportunity for Council to leverage existing projects in other areas and to integrate the open space strategy with other Council policies and guidelines, as well as with individual planning decisions. This would allow Council to save resources (cost, effort, staff time) and to take advantage of any available funding from state government and developer contributions. A pertinent example is Cremorne, as described later in this submission.

Adjust the open space contribution rate

The current developer contributions levy for open space in Yarra (Clause 53.01 of the Yarra Planning Scheme) does not apply to developments in which no subdivision is required.

This means that large scale commercial developments which are currently occurring particularly in Collingwood, Richmond and Cremorne do not result in any mandatory public open space contribution to Council, even though they will result in a large increase in workers and corresponding pressure on existing open space in these areas. Many existing redevelopments are replacing two or three storey buildings with six or eight storey buildings, with no open space levy payable under the current planning scheme.

The YOSS identified that forecast growth in the number of workers in Yarra, not just growth in residents, will increase the need for additional open space, particularly in higher density precincts, and has highlighted this specifically with reference to each of the study precincts. The YOSS also identified a potential source of funding for new open space in Yarra would be to increase the open space contribution rate from 4.5% to around 10%.

Whilst Streets Alive Yarra agrees that the levy should be significantly increased, we consider that it should also be applied to large scale developments, even where subdivision is not proposed. This could be based on either a development cost above a certain value (for example, \$10 million), or on a minimum increase in floor area ratio (FAR, for example increase of 2 or more). For example, if an existing two storey building (FAR = 2) was proposed to be replaced with an eight storey building covering the whole site (FAR = 8), the FAR increase would be 6 and an open space levy would be payable to Council.

Work with the VPA to improve Cremorne

The Victorian Planning Authority (VPA) in conjunction with Council is currently developing the *Cremorne Place Implementation Plan (CPIP)*, which will include overall planning guidance for private and public space in Cremorne, as well as a prioritised set of projects for implementation: <https://vpa.vic.gov.au/project/cremorne/>.

Whilst the publicly available information on this project is still in the preliminary stages, consultation feedback has identified a high community priority for more and higher quality public open space in Cremorne, with a number of innovative suggestions on how this could be funded and practically implemented, including:

- Given the very high cost of land acquisition in Cremorne, land already owned by state government entities could be converted to parkland/public open space;
- If available government land was in an unsuitable location, land swaps could be negotiated with owners of more suitable land parcels which were awaiting redevelopment;
- Better use of street and laneway space (between private property boundaries) as green/recreational space; and
- Better access to existing green space, such as by improving pedestrian access across Punt Road to Gosch's Paddock and the sporting precinct.



PUBLIC AND OPEN SPACE

The community has identified opportunities for **underutilised government land** to be repurposed and contribute improvements, particularly open space and amenity which supports Cremorne's future.

A **greener** Cremorne is highly supported through a range of options including improved access to existing public space, more public space and public realm improvements, and through new developments.

The community wants more open space to cater for the needs of the growing community but accepts that space is limited and supports small and creative improvements to the **public realm and open space**. Some community members supported reducing car parking to create public space. However, it is recognised that parking space is a sensitive issue within the community that requires careful consideration.

Community wishes to participate in improvements to public spaces through **local placemaking initiatives** and encourages trialling potential improvements.

Source: Capire Consulting Group (2020). Cremorne - Issues and Opportunities Paper, Stage 1 Engagement Outcomes Summary Report

Whilst the draft YOSS was being developed at the same time as the CPIP, there does not appear to be any direct link or cross-referencing between the documents published to date, and it is unclear whether the responsible parties have discussed any of the overlapping themes or guidelines.

Streets Alive Yarra would like to see the CPIP incorporating the Cremorne-specific gap analysis and other general suggestions from the YOSS. Streets Alive Yarra also notes that minimal public open space contribution levy is currently payable by developers in Cremorne, as the vast majority of large scale developments are commercial, with no subdivision required. It is likely that this observation would also apply to the other densely developed parts of Yarra, such as Fitzroy, Collingwood and the western portion of Richmond.

Concluding Remarks

Streets Alive Yarra applauds Yarra's efforts to engage with residents, workers and other ratepayers on how our open space can be planned, improved and prioritised. We would be delighted to provide further detail or explanation of the themes raised in this document.

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